

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
WELDED CONSTRUCTION, L.P., <i>et al.</i> ,	:	Case No. 18-12378 (LSS)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	:	Re: Docket No. 1869
	:	

**CERTIFICATE OF NO OBJECTION REGARDING
POST-EFFECTIVE DATE DEBTORS' SIXTEENTH (16TH) OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 503 OF
THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1**

The undersigned hereby certifies as follows:

On July 1, 2022, the above-captioned debtors and debtors in possession (together, the “Debtors” and, following the Effective Date, the “Post-Effective Date Debtors”), through Cullen D. Speckhart, solely in her capacity as Plan Administrator, filed the *Post-Effective Date Debtors’ Sixteenth (16th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 503 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1* [Docket No. 1869] (the “Objection”). Pursuant to the notice of Objection, the deadline for filing and service of objections or responses to the Objection was July 15, 2022 at 4:00 p.m. (ET) (the “Response Deadline”).

Prior to the Response Deadline, the undersigned received an informal response from counsel to Travelers Indemnity Company and its Property Casualty Insurance Affiliates (collectively, “Travelers”), concerning the Objection. Travelers’ informal comments to the Objection have been resolved and Travelers does not contest the relief requested in the Objection

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Welded Construction, L.P. (5008) and Welded Construction Michigan, LLC (9830). The mailing address for each of the Debtors is c/o P.O. Box 470, Perrysburg, OH 43552-0470.



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and does not object to the entry of the proposed form of Order sustaining the Objection attached hereto as **Exhibit 1** (which form of order remains unchanged from the form of order filed with the Objection, except the caption has been updated).

Other than Travelers' informal response, no other formal or informal response to the Objection has been received. The undersigned further certifies that he has caused a review of the Court's docket in these cases and no objection or response to the Objection appears thereon.

Accordingly, the undersigned respectfully requests entry of the proposed form of Order sustaining the Objection attached hereto as **Exhibit 1** at the earliest convenience of the Court.

Dated: August 15, 2022
Wilmington, Delaware

BLANK ROME LLP

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Counsel to the Post-Effective Date Debtors

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
WELDED CONSTRUCTION, L.P., <i>et al.</i> ,	:	Case No. 18-12378 (LSS)
Debtors. ¹	:	(Jointly Administered)
	:	Re: D.I. 1869

**ORDER SUSTAINING POST-EFFECTIVE DATE DEBTORS' SIXTEENTH
(16TH) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS
PURSUANT TO SECTION 503 OF THE BANKRUPTCY CODE,
BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1**

Upon consideration of the *Post-Effective Date Debtors' Sixteenth (16th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 503 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1* (the "Objection")²; and it appearing that this Court has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that venue of these chapter 11 cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Post-Effective Date Debtors, their estates, their creditors and other parties in interest; and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record herein; and after due deliberation thereon and good and

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² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Objection.

sufficient cause appearing therefor; it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Objection is SUSTAINED, as set forth herein.
2. The Amended Claims identified on Exhibit A to this Order are hereby disallowed and expunged.
3. The Duplicative Claim identified on Exhibit B to this Order is hereby disallowed and expunged.
4. The Post-Effective Date Debtors' objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
5. Any and all rights of the Post-Effective Date Debtors and their estates to amend, supplement, or otherwise modify the Objection and to file additional objections to any and all claims filed in these chapter 11 cases, including, without limitation, any and all of the Disputed Claims shall be reserved. Any and all rights, claims and defenses of the Post-Effective Date Debtors and their estates with respect to any and all of the Disputed Claims shall be reserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claims.
6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A
AMENDED CLAIMS

No.	Name of Claimant	Date Claim Filed	Claim Number	Claim Amount		Surviving Claim Number
1	The Travelers Indemnity Company and its Property Casualty Insurance Affiliates	2/28/2019	613	Unliquidated \$0.00 \$0.00 \$0.00	Administrative Secured Priority General Unsecured	842
2	The Travelers Indemnity Company and its Property Casualty Insurance Affiliates	2/28/2019	620	Unliquidated \$0.00 \$0.00 \$0.00	Administrative Secured Priority General Unsecured	843

EXHIBIT B
DUPLICATIVE CLAIM

No.	Name of Claimant	Date Claim Filed	Claim Number	Claim Amount		Surviving Claim Number
1	The Travelers Indemnity Company and its Property Casualty Insurance Affiliates	2/28/2019	842	\$109,166.00	Administrative	843
				\$0.00	Secured	
				\$0.00	Priority	
				\$0.00	General Unsecured	